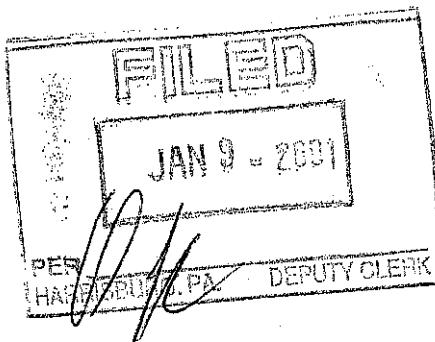


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
Harrisburg  
JOHN RICHARD JAS  
Plaintiff  
vs  
JUDGE'S COPY  
CIVIL No. 100-00000  
U.S. DISTRICT JUDGE  
Magistrate Judge S...

DR. RONALD CLARK,  
MARTIN L. DRAGOVITCH,  
JOHN A. PALOKAVITCH,  
ROBERT N. NOVOTNY,  
MICHAEL J. KAZORABA  
JOHN ANDRADE,  
Defendants

PLAINTIFF'S BRIEF  
OPPOSITION TO CURE  
DEFENDANT'S MORTANT  
REVOKE PLAINTIFF'S  
[REDACTED] FORMA PAUPERIS  
STATUS AND TO DETERE  
[REDACTED]  
RESPONSE TO PLAINTIFF'S AMENDED  
COMPLAINT

Filed By: MR. JOHN RICHARD JAS  
Plaintiff's Case



MR. JOHN RICHARD JAS  
#BQ-3Q19  
SOT-Greene/SMW  
175 Agness Drive  
Waynesburg, PA 15370

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B. HAS THE PLAINTIFF SHOWN THAT HE WAS UNDER IMMINENT DANGER OF SERIOUS PHYSICAL INJURY AT THE TIME OF THE INCIDENTS ALLEGED IN HIS INITIAL COMPLAINT? 2 - - - - -

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## I. ARGUMENTS

### A. SHOULD CORRECTIONS DEFENDANTS'

MOTION TO REVOKE PLAINTIFF'S IN FORMA PAUPERIS STATUS AND TO DEFER FILING OF RESPONDENT PLEADING TO PLAINTIFF'S AMENDED COMPLAINT BE DENIED FOR THEIR FAILURE TO COMPLY WITH THE REQUIREMENTS SET FORTH IN GIBBS V. ROMAN, 116 F.3d 833 (3d Cir. 1997).

(Suggested Answer: Yes)

Plaintiff avers & submits that, in Gibbs v. Roman, 116 F.3d 833 (3d Cir. 1997), the United States Court of Appeals for the Third Circuit, stated & held:

"In resolving a contested issue of imminent danger, the district court may rely upon evidence supplied by sworn affidavits or depositions, or alternatively may hold a hearing." (Gibbs, 116 F.3d at 87).

However, in this instant case, Corrections Defendants evidence which they have submitted in support of the Motion to Revoke Plaintiff's In Forma Pauperis and to Defeer Filing of Responsive Pleading to Plaintiff's Amended Complaint contains no depositions & no sworn affidavits that such is true & in fact, Corrections Defendants fail to even include therewith an un declaration that such is true under penalty of perjury & to 28 U.S.C. § 1746, and thus this Court cannot legally construing federal law as set forth by an Third Circuit Court of Appeals, even consider non rely upon

especially not since the Plaintiff has challenged the authenticity of such evidence and the credibility of those who developed/made such evidence, herein. Obviously the Court can only consider/rely upon evidence supplied by sworn affidavits or depositions, and the evidence submitted by the Corrections Defendants, herein this case, would have certain evidence supplied by sworn affidavits or deposition, have Corrections Defendants' evidence why they have submitted herein this case does "not" contain such required sworn affidavits or depositions, and as a consequence, Corrections Defendants' B Revoke Plaintiff's In Forma Pauperis Status And B Defendants' Responsive Pleading B Plaintiff's Amended Complaint must Under the Controlling Federal Law, be denied for their failure to submit their evidence, by sworn affidavits or depositions as required by our Third Circuit, in Gable, supra.

B. HAS THE PLAINTIFF SHAWN THOMAS HE WAS UNDER IMMEDIATE DANGER OF SERIOUS PHYSICAL INJURY AT THE TIME OF THE INCIDENT ALLEGED IN HIS INITIAL COMPLAINT?

(Suggested answer: Yes)

Plaintiff avers & submits, that based upon the facts submitted in his initial & amended complaints, as well as that stated in his accompanying Affidavit of Plaintiff's Brief In Opposition to Corrections Defendants' Motion to B Plaintiff's In Forma Pauperis Status And to Defendants' of Responsive Pleading B Plaintiff's Complaint, herein, as well as that stated, argued & set forth in his next Argument brief herein, in Opposition, below, Plaintiff has shown that he was under immediate danger of physical injury at the time of the incident(s) alleged in his initial Complaint, herein. Therefore, Corrections Defendants' motion to Revoke Plaintiff's In Forma Pauperis And to Defendants' Responsive Pleading B Plaintiff's Amended Complaint, must, by law be denied with prejudice.

Plaintiff had planned to submit his relevant evidence by Sworn Affidavit, herein, Ms. Sue Turner SCI-Greene Prison Lt. Brantley, who is a person who does not practice in matters Legal, Papers herein, illegally registered notarized Plaintiff's Affidavit herein, thus Plaintiff has no choice to submit such by Unsworn Verification contemporaneously with Plaintiff's

C. SHOULD PLAINTIFFS IN FORMA PAUPERIS STATUS BE REVOKED HEREIN IN THE CASE AND PLAINTIFFS REQUIRED TO PAY THE FEES UPFRONT ALL AT ONCE?

Suggested Answer = No

## Corrections Defendants states Texas

In an order October 6, 2000, this Court found that plaintiff had filed his application to proceed in forma pauperis, the plaintiff alleged that he was in imminent danger of serious physical injury because he is currently held at the dated October 5, 2000, at p. 9. This Court concluded that the Correcting Defendant "have conclusively challenged the plaintiff's assertion of imminent danger." (Id. at p. 10.) The Court did not find the Correcting Defendant's opposition to plaintiff's evidence concerning the issue of imminent danger, and a supplemental brief in support of the motion to the Corrections Defendant. Relevant evidence is contained in the appendix to this brief, as well as the appendix to the Correcting Defendant's brief, opposition to plaintiff's motion for a temporary restraining order (which was filed on October 16, 2000).<sup>15</sup>

However, by way of reply to the above, plaintiffs further submit, that  
keying to the date October 6, 2000, Defendants, "will" not "offer" any  
relevant evidence, all and with the exception of the set of the following pages, of the  
Supplemental Statement in Support of Motion to Revise, Plaintiff's In forma  
Pauperis Status and Defendants' and of responsive pleading to Plaintiff's  
Amended Complaint, heretofore the scope, and that the rest of current type,  
Defendant's Exhibit, herein, are not relevant to the time of the facts,  
alleged in the plaintiff's initial complaint, at Paragraphs 13, 14, and 15,  
Application for Leave to Proceed In forma Pauperis, heretofore, the only

Such contentions. Defendant's Exhibits contain only information which pertains to events or facts which occurred either before and/or after the time period to which Plaintiff's Exhibits pertain.

5/16/2018 See Counterclaims Defendant's Supplemental Brief in Support of Motion  
7 Brockette Phinney AP's In Forma Pauperis Status And 73 Docket # 71724 of  
Responsive pleading BA Plaintiff's Amended Complaint herein this cause  
at 12. Unopposed by Plaintiff as Counterpart Defendant to Plaintiff's Motion

Relevant ~~incident~~ dates alleged in plaintiff's initial complaint, for which Plaintiff claims he was in imminent danger of ~~and~~ physical for her in this case.

FURTHERMORE, IT) (PENNSYLVANIA, 116 F.3d 33 (3109, 1997)) the U.S. Court of Appeals for the Third Circuit states that:

11 We emphasize that the ~~pre~~ period is when examining  
12 on the date the complaint is filed pursuant to Rule 12(b)(1) must  
13 be the imminent danger faced by the inmate at the  
14 time of the earlier filing, and not at the time the  
15 complaint was filed. (See HCCP 12(b)(1))

Therefore, because Corrections Defendants have failed to file evidence / exhibits which are "not relevant to the determination of the issue" whether or not the Plaintiff was under the charge of the Plaintiff's injury on the dates of the incidents alleged in the Plaintiff's Complaint, herein, this case, "they will have violated the cause of action October 6, 2003, herein), to file any Exhibit " evidence concerning the issues of imminent danger, and they have failed to file evidence violated Fed. R.Civ. Rule 40 and 403 and the U.S. thus can not may "not" by law consider Corrections Defendants' exhibits in their defense submitted herein, with the exception of the second amendment No. 5, of their Appendix to Corrections Defendants' Statement and the Appendix to Plaintiff's First Amended Complaint.

In support of the above, Plaintiff's Amended Complaint, for this  
Filing of Responsive Pleading to Plaintiff's Amended Complaint, for this  
Court to consider such Plaintiff's Notice submitted by the Corrections Dept  
herein, would be for this Court to violate the Order/holding of the Third Cir.  
Gibbs v. Romer, 116 F.3d at 267, as Plaintiff repeats herein, supra above  
and, that this Court has no legal authority to do and to do so would  
clearly also be an abuse of discretion and authority of this Court, as this  
is legally bound by all must apply decisions of the U.S. Court of Appeals  
for the Third Circuit, and the Plaintiff's Notice is a Motion for Partial Dismissal to the

6) Correctional Defendants Exhibiting Form 9 meet part of the requirement to the evaluation of the plaintiff by a maximum security psychiatrist after the date which occurred from June 6-July 18, 2000 over 18 months after the date the Plaintiff alleged the Plaintiff filed his initial complaint for which the Plaintiff contends he was not in imminent danger of self-harm. Plaintiff for and just because the Plaintiff was not suicide then, doesn't mean he was not suicidal back in April 2000.

17th Circuit, herein this 18th day of January, 1900.

## Second of all, Corrections Defendants who

11 A S Shawn below and in the Appendix Plaintiff's allegations of imminent danger are belied by the facts. Plaintiff was assessed by trained mental health professionals. In every instance they found that there was no risk of plaintiff's suicide. Plaintiff's so called attempts of suicide are attempts to manipulate the staff of CI-Camp HI to achieve plaintiff's goals and agendas. When contrasted with the self-boring allegations of an uneducated inmate who has been found by this Court to have falsely alleged imminent danger twice before, the conclusions in the table the Plaintiff against's misrepresenting the facts than attempt to manipulate this Court into intervening in the Pennsylvania Department of Corrections decisions concerning the housing of its inmates. Moreover the self-created risk is not one cognizable under the amendments enacted by the Prison Litigation Reform Act to the federal statute 28 U.S.C. § 1915(g). 117

fail to & does not state nor  
address, & thus such lare inadmissible here, for the following  
attempt at suicide lare lare not attempts to manipulate the staff to  
achieve plaintiff's goals & agendas, but rather such lare is  
to commit suicide because he heard voices telling him to do  
such lare because of the failure of Defendant Dr. Clark & corrections  
Dragovich, Palatovich, Abistrey & Kaas to have Plaintiff's severe  
mental health illness disease treated by prescribing the  
plaintiff psychotic medication(s) and/or having him committed  
to a mental health facility & because the Plaintiff was sent  
to hell & torture that he had been going through that in the self-cam  
RHU's and Judge Rambo of this Court has already found that Plaintiff  
to commit suicide on April 23, 2000, was real, in her Order in Jackson  
et al., CR# No. 1-GR-99-CO71 of October 6, 2000, when she stated hell:

11 The institution in this case has a further concern in that Plaintiff attempted suicide by swallowing metal fasteners from his paper documents. 119f

paper document. //

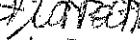
fifth of all, Plaintiff's allegations are "not self-serving, at least not in the  
sense that Corrections Defendants mean it plain". It is both an undiscerned  
but rather he "has" a high school equivalency diploma (G.E.D.) a paralegal  
certification & he is self-taught/learned in law and in psychology, as to which he  
studied numerous legal, psychology, psychiatry & sociology & mental health  
treatise(s)/papers, reports & text books & he is well versed in the field of  
health law, as mental health law/patient's rights & what he first became  
involved over 22 years ago now & as years ago he worked as an assistant  
to the previous Executive Director at United Mental, Inc. on a volunteer basis  
& he (among others) taught him all about such, & what's more is that there  
are disputes that he has ever falsely alleged imminent danger to the Plaintiff to be  
even if he had done so, that does not necessarily mean that he is doing so again  
in this case, which he is not, & thus the conclusion is that the Plaintiff, for plaintiff

8 / See ~~Amended~~ <sup>Amended</sup> In suit of Plaintiff v. Defendant for <sup>Plaintiff</sup> Correction: Defendant  
9 Plaintiff's Informative is <sup>not</sup> valid as it is <sup>not</sup> in the proper form and contains  
9 special and specific information for the trial of this case. For the a

"not" again misrepresenting the facts in a Dattern attempt to manipulate this court intervening in the Pennsylvania Department of Corrections regarding the housing of its inmates, however, it is true that this Plaintiff is requesting this court to intervene in the Pennsylvania Department of Corrections illegal & rights violating decisions to house/confining this Plaintiff in a Prison RHU and the Plaintiff by § Under Federal Law, the Pennsylvania Department of Corrections or the Defendants herein in this case are allowed by § under Federal case authority to house/ confine this Plaintiff who has a significant history of an incurable mental illness disease from RHU and /or SMU, but they have done all the wrongs & thus, by law, this court has a legal duty & obligation to intervene in such a case to such § § Xth of all, for the reasons & arguments set forth herein at 1/2-13/2001 that base is created risk, but is also liable under the amendments enacted by ATSON Litigation Reform Act to the Federal T.E.P. Statute, 28 USC § 1331  
As to the Corrections Defendants' specific untrue, irrelevant & frivolous arguments therein pp. 4-5 of their 10/23/00 Supplemental Br. in Reference, Plaintiff submits the same to such as he states herein this Plaintiff at 5-4, up to & including such the fact that Corrections Defendants Defendants cannot deny circumstated of U.S. Magistrate Judge Smyser of July 19, 2000, in Case No. 5:00-cv-0019 to bolster & bootstrap their otherwise untenable & unsupported contention of a final order herein this instant case, because such is "not" a final order & (Pec) herein this instant case, because such order appeal to the U.S. District Court presently Plaintiff has such order an appeal to the U.S. Court of Appeals, if such order this Plaintiff will appeal such to the U.S. Court of Appeals, if such order this Plaintiff will appeal such to the U.S. Supreme Court, & since either one of these courts could be if necessary to the U.S. Supreme Court, & since either one of these courts could be under such is not a final order & Corrections Defendants may not use and rely upon the same in this case.

corrections Defendants' next claim & argue that:

11 As noted previously Plaintiff's Defendants' Pretrial Oppression  
(BPL) Appeal's Motion for Temporary Restraining Order and Unlawful  
Preliminary Injunction, plaintiff was transferred to the State  
Correctional Institution at Waymart ("SCI - Waymart")  
for a mental health evaluation. As part of that transfer, the risk of  
plaintiff's possible suicide was assessed. A thirteen  
factor analysis was used of which only two factor of lower  
significance were identified as being extreme. See Suicide  
Risk Indicators Checklist for RHI/SMU for Inmate No.  
BQ-3210, dated June 6, 2000, attached as Exhibit 3 to the Appendix  
to this Brief.

Also, in D-284 of their 10/23/01 SUPPLIANT'S BRIEF, Plaintiff Defendants  
"A redacted copy of the confidential documents is being  
submitted as Exhibits to the Appendix to the brief. An unredacted  
copy can be submitted to the Court for an opinion or ruling. In  
order to protect the confidentiality of the documents and prevent  
the plaintiff from using that information in the document to refute a  
plaintiff's claim, the government documents and its beatific file  
privileges are asserted as to their full response." 

However, by way of reply to the above, the Plaintiff hereby submits that he  
has not been given a copy of this document being submitted to this Court for  
any unredacted copy of this document being submitted to this Court for  
Camera review unless such is also provided to the Plaintiff as by the  
federal law, the Court is not permitted to receive ~~ex parte~~ communication  
from a party nor the party's attorney & besides, such would provide  
Court with ~~information~~ (material) evidence which the Plaintiff has ~~information~~  
not been able to make any arguments in defense of the validity, having  
thereof, which will be made in the ~~unjust~~ bases of the Court in which  
Plaintiff's ~~rights~~ go to stand & others in this brief in support of Plaintiff  
Order allowing Plaintiff to Review And Copy HR 4270. Plaintiff  
Records at 2-5, Plaintiff also objects to this Court being given  
Unredacted copy of such unless such is also provided to him, herein, and  
in as far as concerns Defendants' assertion/claims of the government documents  
and deliberative process privileges are concerned, this Plaintiff has never  
heard of & does "not" believe that there even exists any deliberative process privilege  
& furthermore he does "not" believe that the government document privilege even for  
one can such be used to bar an individual from obtaining your records when such records are

and such records are not the property of the Pennsylvania Department of Corrections & thus the government documents privilege does not even apply. Such furthermore, the government documents privilege does not cover everything that officials may want to keep secret. It is designed to protect "deliberative" and decision making processes of government officials and investigation reports of an administrative agency to the extent that they reflect a rather than factual material. See Kinney v. Mitchell, 67 F.R.D. 1016 (D. Conn. 1975), Kelly v. City of San Jose, 114 F.R.D. 655, 658-59 (N.D. Cal. 1987). In the instant case, the material is factual rather than administrative and does not reflect deliberative and decision making processes of governmental officials and thus, the government documents privilege cannot be used by Corrections Defendants. Does such even apply herein to this instant case to such psychological records? Because this cannot be used to protect information about something that the Plaintiff himself put in issue. See E. & O. C. v. General Telephone Co. of Northwest Indiana, 575, 578 (4th Cir. 1989), cert. denied, 111 S.Ct. 310 (1990); Anderson v. Nixon, 144 F.Supp. 1199-1200 (D. D.C. 1988) and the Corrections Defendants have such information, herein, this instant case themselves, & thus they cannot use such government documents privilege.

Also, if Corrections Defendants provide this Court with unredacted copies of such exhibits than they automatically lose their right to claim that such information, as prison officials may not assert that information is privileged if have released it to other persons. A privilege should not be regarded as a right to can be disclosed to same & withheld from others. See In re Natta, 48 F.R.D. 322 (D. Del. 1969), accord, Matter of Continental Illinois Securities Litigation, F.2d 1302, 1314 (7th Cir. 1981); Bergman v. Temp. Order, D. 413, 416 (U.S. Dist. Ct. Clark v. Township of Falls, 124 F.R.D. 91, 94 (E. D. Pa. 1988). Finally, on the Plaintiff's own submissions, that he could not use such information in the event to foreign a sufficient risk, as he does not know how to do so.

As to the Corrections Defendants other claims & arguments on p. 6 of Supplemental Brief In Support of Motion to Revoke Plaintiff's In Fama filer status and to Denying of Responsive pleading to Plaintiff's Amended Complaint by way of reply to such, avers & submits, first of all, that such is not relevant as has nothing to do with the issue of whether or not the Plaintiff was under imminent danger of serious physical injury at the time/date of the incident alleged in his initial complaint, herein (April 23 & 24, 2000), and, given such, Court by law may not consider such a document or exhibits of Corrections Defendants just because this Plaintiff was not suicidal from June 6-July 1, 2000, has to do with whether he was suicidal on April 23-24, 2000) or on April 23, 2000.

and/or Exhibits/Evidence at all) showing/proving that this Plaintiff  
 "not" suffered at the times/dates of the incidents in Plaintiff's TIA  
 complaint as to which this Plaintiff contends that he was under  
 danger of serious physical injury as a direct result & because of each  
 given such fact of the foregoing, corrections Defendants "have" failed to show/prove  
 this Plaintiff was not under imminent danger of serious physical injury  
 time of the incident(s) alleged in his initial complaint, hereto, as they did not  
 order to have Plaintiff's In Fama pauperis status revoked, herein this case of  
 such should "not" be revoked, herein this case, second of all, contrary to the  
 Corrections Defendants' Exhibits or their Appendix B Corrections Defendants' Suppl  
 Br Ref in support of Motion to Revoke Plaintiff's In Fama Pauperis Status And the  
 Filing of Responsive Pleading to Plaintiff's Amended Complaint Plaintiff  
 that he never stated that it has been approximately 5 years since he  
 these experiences of hearing voices telling him to hurt himself as he  
 had these experiences of hearing voices telling him to kill himself on February  
 2000, on April 23 & 24, 2000 & any contention that he had stated to the SAU  
 Psychiatrist and/or SAU team that he has not had these experiences  
 approximately 5 years "is" an out & out deliberate & malicious "lie" & that  
 herein, & Plaintiff challenges the veracity of such, third of all, the Plaintiff  
 conclusion that Plaintiff's acts of self-mutilation in the past did  
 any serious suicide attempts, (Exhibits to Corrections Defendants' TIA) support  
 "is" unfounded & ludicrous, as Plaintiff's past attempts at self-harm  
 "were" serious enough to have him involuntarily committed to mental health  
 facilities/state hospitals and serious enough that this Plaintiff  
 freed from such past attempts at suicide/self-mutilation on several occasions  
 & the contention of the SAU Psychiatrist that he was unable to appreciate  
 serious suicide attempts, shows that he is "not" qualified nor proper  
 Psychiatrist, as no other Psychiatrist who has examined this  
 Dr who would examine this Plaintiff in the future has ever made  
 makes such a determination/state ment as to this Plaintiff upon a basis  
 Plaintiff's mental health history/record, and, in fact, Plaintiff's  
 process of preparing a formal written complaint against this  
 Waymart SAU Psychiatrist, Dr. Ramon, to be filed with the Pennsylvania  
 Department of Professional and Occupational Affairs, requesting that said

Sick Psychiatrist!! "IS" adds disgrace to his profession &ame to those he treats, & fourth of all, said SCI Waymart SAV Psych Conclusion/opinion here, IS just that, an opinion & just as such everyone has an opinion, but his IS worthless (just like his). This Plaintiff could bring at least to other Psychiatrists that would state otherwise & disagree with this "IS" Psych Assessor dumb opinion/conclusion, and fifth of all, such has nothing to do with nor IS relevant to the issues herein, as the Plaintiff has already argued, herein, supra.

Correcting Defendants next claim & office, that:

1) A summary evaluation of plaintiff was prepared upon his discharge from Special Assessment Unit (SAU) at SCI Waymart. A copy of that summary is attached as Exhibit D to the Appendix. This evaluation report is as follows: Based on our evaluation herein the SAU, it is clearly apparent that this inmate has his own agenda when he came out he was coming here to the SAU. According to staff reports, he did mention that he would be staying here at SCI Waymart for a long time and would most likely get committed to the Forensic Unit. Also in talking with the inmate, his other agenda is to be classified as mentally ill and hence have his R/HU time decreased. Also, he voiced his desire to be transferred to the Intermediate Care Unit here at SCI Waymart. Having said this, we are like to use the excuse of having a mental illness as a reason on rationale for his behavior problems which he has exhibited in the past which are too numerous to account at this time and also some behavior problems which he has demonstrated for us here at the SAU.

\*

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\*

\*

As I mentioned initially, we were considering an organic impairment. However, based upon this evaluation, we do not believe organic impairment which would account for his numerous misconducts, numerous assaults prior to his incarceration, and his behavior.

\*

\*

\*

\*

\*

Throughout his stay [REDACTED] here at the SAU, he has continued to deny any [REDACTED] - SUICIDAL -- PATENTS -- SCI-Waymart Psychiatric Discharge Summary (Special) Assessment Unit (SAU), John Doe, dated July 19, 2000, at page 2, thus, the assessment of medical staffs professionals with regular and extensive experience in dealing with inmates is that the plaintiff presented no real risk of suicide in June and July of 2000. In addition to the assessments made

PLAINTIFF (Plaintiff) WAS REGULARLY ASSESSED while he has been incarcerated at the State Correctional Institution At Camp Hill (SCI-Camp Hill). Corrections Defendants are including as Exhibit 8 to the Appendix a selection from the mental status review, from the months of April, May, August and September 2000. Consistently these reports find no evidence of a risk of suicide. Instead, they find Plaintiff is stable, with no additional health issues concerning. See, e.g., Mental Status Review for April 17, 2000. They do find that Plaintiff prefers unit 14 and seeks to avoid placement in the special management unit and acceptance of the responsibility for his actions. See, e.g., Mental Status Review for August 8 and 14, 2000. (12)

By way of reply to the above foregoing, the Plaintiff states that, first of all, none of such is relevant to the issue of whether or not this Plaintiff was under imminent danger of serious physical injury at the time/date of the incident(s) alleged in his initial complaint, this case, & given such, this Court by law may not consider any exhibits of the Corrections Defendants, herein this case, second, based upon what the Plaintiff states & sets forth & argues herein this Plaintiff states & sets forth under second oath therein Paragraph 19-29 & 31-35 of his accompanying Affidavit in Support of Plaintiff's Brief in Opposition to Corrections Defendants' Motion to Remove Plaintiff from Plaintiff's Status And to Deterrenting of responsive pleading to Plaintiff's Amended Complaint. SUCH Corrections Defendants' arguments are factually frivolous, specious, unreliable & untrue, herein this Plaintiff and are contrary to Federal law.

As to Corrections Defendants' claims & arguments, on pp. 2 of their 10/23/00 Supplemental Brief, herein this case, Plaintiff by way of reply to such, avers & submits that Plaintiff affirms it is true that this Plaintiff bears the burden of proof, the paper showing that he was under imminent danger of serious physical injury at the time of the incidents alleged in his initial complaint. It is also true that it is the Corrections Defendants' burden of making paper showing that the Plaintiff is not in imminent danger. (see Corrections Defendants' 10/23/00 Supplemental Brief, p. 28)

Prominent danger or not I've given them the ones who have challenged such, herein, and that while the Plaintiff's burden, herein, the Corrections Defendants have "not" met the same at all, herein, second of all, Plaintiff's allegations are not self-created, but are a direct result of his documented significant serious mental health illness disease which he has no control & furthermore such is documented from medical & mental health reports & records which the Plaintiff had requested this Court order that he be allowed to review & copy, herein, but which this Court has not legally identified him. So there is medical support for his allegations and rationale to support his contentions herein, but he has been not legally denied his rights to present such by this Court, herein, the not of a Judge Rambo of this court, has already found that the Plaintiff has attempted to commit suicide by swallowing metal fasteners from his paper documents (3 paragraphs), to be in Plaintiff's favor, herein, this Court does not have to engage in speculation as to the likelihood of the Plaintiff attempting to commit suicide, given what the Plaintiff states & argues above (supra), not of all, while Corrections Defendants claim that they have provided a substantial record which contrasts Plaintiff's self-serving allegations, they have offered no evidence at all, herein proving that the Plaintiff's allegations are fact self-serving and as to the substantial record they claim they have provided, the Plaintiff has shown that the record/exhibits which they have provided, herein, is not relevant to the issue of whether or not Plaintiff was under imminent danger as his physical injury at the time of the Plaintiff's allegation (3/see Judge Rambo October 6, 2000, order in Tiers Long, et al., case number 1:00-cv-01090-SHR).

his initial complaint, herein this case, ~~is~~ <sup>with</sup> of all, ~~to~~ psychiatrists & psychologists which evaluated this plaintiff were/are not trained mental health professionals, ~~upon~~ upon what the plaintiff has stated ~~for~~ <sup>in</sup> herein, ~~nor~~ have the Corrections Defendants submitted any evidence ~~all~~ herein showing that such psychiatrists and psychologists who evaluated this plaintiff are actually trained & qualified mental health professionals & just the fact the Corrections Defendants state they are ~~is~~ just not good enough, especially since this plaintiff challenges psychiatrists & psychologists training qualifications, a Corrections Defendants have produced no evidence what ~~at all~~, herein, showing where such psychiatrists & psychology went to school or graduated from (assuming they actually ~~do~~ that they are licensed to practice by the Commonwealth of Pennsylvania, nor ~~do~~ how they are trained mental health professionals as they must legally do) & this ~~is~~ cannot automatically just accept that they are trained mental health professionals the absence of some relevant evidence that such ~~is~~ so, may this court engage in speculation as to such ~~or~~ just as Corrections Defendants word for such ~~is~~ much more ~~for~~ required by & under federal law than just Corrections Defendants unsupported and self-serving allegations that they are trained mental health professionals, ~~in~~ <sup>entirely</sup> of all, that while it is true that this Plaintiff has no formal mental health training he is not uneducated in mental health/psychology/psychiatry/the psychiatrists & psychologists (alleged mental health professionals) only categorically state that plaintiff presents no real risk of suicide in June & July 2000, however, they do no state anywhere that plaintiff presents no real risk of suicide from April 23, 2000, ~~in~~ <sup>to</sup> the only time period/dates which are relevant, ~~in~~ <sup>entirely</sup> of all, while the

<sup>14</sup> See Plaintiff's claims & arguments, here in this brief support.

get what he wants, such is merely these Psychiatrists/psychologists and, again, opinions are like assholes, everybody has them & plaintiff will at least 10 other Psychiatrists & psychologists in court who would dispute neither the Prison Psychiatrists & psychologists nor the Corrections Defendants offered any valid concrete relevant evidence nor proof that Plaintiff is actually manipulative individual who will do anything to get what he wants & in order for the Court to accept & agree with such, the Court would have to engage in speculations that this Court is "not" permitted to do by & under the controlling federal law, all, Plaintiff does "not" have no ~~has~~ he made prior probable allegations that the record herein is "not" clear, Plaintiff does "not" file a claim of imminent harm, health this case, even though Plaintiff's imminent danger physical injury is "not" self-created nor is it self-inflicted, as Plaintiff has a mental health relapse and hears voices telling him to hurt and/or to kill, he does "not" create and does he have any controls/avenues such as his confinement till he's disease creates & controls such, nor can this Plaintiff manipulates to serve his needs & to the psychological assessments of the Plaintiff in the Requesting Defendants Appendix To Supplemental Brief in Support of Motion to Plaintiff's Term Appropriate And To Denying Appropriate Pleading To Plaintiff's Complaint which state to the contrary are "not" reliable, truthful, trustworthy and/or evidence & besides this, the Plaintiff also challenges the authenticity of such as he does not believe such Corrections Defendants' Exhibit, here copies of the originals of such & even assuming ~~assuming~~ that they are, still "not" reliable nor trustworthy, as they "are" by Prison Psychiatrists for Corrections Defendants prison officials & "are" self-serving & unreliable as proper evidence for Corrections Defendants, herein this Plaintiff's Psychiatrists & psychologists from Staff can't be relied upon, they are also goes to Prison Mental Health Records/Book-Keeping Evidence (Case/Charity) 466F2d 762 (7th Cir. 1972) (and cases cited) Ramona Haught (Qd082403) & Morales Relic (and Hernandez Cid, 697ESupp2d 1012 P.R. 1982) (on unreliability of prison documentation). See also Fair Rend. 803(6)(e) (Optical Photo Submits, here, that IT IS TO ANY BODY who needs to accept responsibility for the Corrections Defendants, herein this case, as they "have" illegally & unconstitutionally placed the Plaintiff in the SCI-Camp Hill Restricted Housing Unit on Disciplinary Segregation in Violation of Federal case law & the federal law is unconstitutional and this Plaintiff's guilty of ~~are~~ on M.R. conduct which is unconstitutional & a direct result of this serious mental health illness disease as a product of a direct result of this serious mental health illness disease as a finding of guilty on my behalf such and they have illegally & unconstitutionally to be transferred & placed in the R.H. Special Management Unit in Violation of

legally & properly) to REVOKE Plaintiff's In Person Petition  
 to prevent the Plaintiff from having his day in court & such because they  
 they are wrong, even if they will not admit it, thirteenth of all, as to Corrections  
 Defendants' claim & argument that

"When the allegations of Plaintiff are weighed against the  
 evidence of the Corrections Defendants, the conclusion is inevitable  
 that Plaintiff has not shown a credible imminent danger of serious  
 physical harm." 15/

Plaintiff avers & submits, that given what he alleges in his initial & Amended Complaints in this case, herein, this Brief & then his accompanying APPENDIX B to the contrary, when the allegations of this Plaintiff are weighed against Defendants' irrelevant, specious & factually frivolous evidence, 16/ he has  
 which is germane to nor even applies to the dates of the events (not  
 herein), the conclusions are inevitable that Defendants have 17/ 18/ 19/ 20/  
 clearly failed to show this court that Plaintiff has not shown a credible  
 imminent danger of serious physical harm, herein, at the dates of  
 the incident(s) as set forth in this Plaintiff's initial complaint, herein, this  
 which "are" credible allegations of imminent danger of serious physical harm,  
 fourteenth of all, as to Corrections Defendants' claim & argument that,

"If so, Plaintiff's motion for EP status which your court hear  
 and he bears the burden of making the preponderance. All this  
 court has are his self-created allegations. There is no medical  
 support for his allegations and no relevant evidence to support his  
 contentions." 16/

Plaintiff avers & submits, that, again, as he sets forth herein, such  
 allegations are "not" self-created, and that there is medical support for his  
 allegations and the there is no relevant evidence to support his contentions of the  
 Plaintiff's Prison Psychiatric/Mental Health Records, which Defendants  
 can "have" illegally & unlawfully & unconstitutionally prevented him from  
 & submitting as his relevant evidence herein this case to prove his allegations  
 are true, as they "are". 17/ Furthermore, Corrections "have" clearly failed to  
 any relevant evidence whatsoever at all showing that Plaintiff's allegations  
 contentions herein, are false and are unsupported by real medical evidence. This  
 court has the unsubstantiated contentions/arguments that Plaintiff's allegations  
 are self-created & unsupported, which is just not good enough here. 18/ 19/ 20/

15/ See Corrections Defendants' 10/23/00 Supplemental Brief at  
 16/ See Corrections Defendants' 10/23/00 Supplemental Brief at

17/ See also Paragraph Nos. 16 & 17 of Plaintiff's Argument in Support of Plaintiff's  
 Thirteenth of all, Corrections Defendants' Motion to Dismiss Plaintiff's In Person Petition  
 to prevent Plaintiff from having his day in court & such because they are wrong, even if they will not admit it,

Revoked Plaintiff's Informal paroles should be denied with pre-  
herein this case, Plaintiff, PLAINTIFF, is the Corrections Defendants by  
spectus, self-scrivng, judicis, where actually Plaintiff claims for a  
attempt to fit the Statute in his head not the Plaintiff, PLAINTIFF, has not the  
risk of committing suicide to such needs nor have the Corrections  
offered any "relevant" evidence at all herein this case showing that Plaintiff actually  
manipulate the risk of him committing suicide to such needs  
all the Court has herein this, "is" Corrections Defendants' Unsubstantiated  
arguments & that such standing alone all by themselves, after just the boundary  
justify Plaintiff's I.P. status being revoked by him in this case, by him self  
Finally, Corrections Defendants claim & argue, that

It will be seen from the following table that

as such, cannot be used, considered nor relied upon by this court, this case, fatally, contrary to what Corrections Defendants claim here, § 1915(g), by its plain language, does "not" at all limit the relief can offer to prospective relief, as § 1915(g) says nothing at all concerning relief the court may or may not offer nor does it limit, § 1915(g), Defendants quote this presumption from a decision of another court, which even the controlling case authority in court and circuit and beyond fact, is the facts that the Corrections Defendants and the Eighth Circuit Courts are reading something into 28 U.S.C. § 1915(g) which just is "not" there at all, & thus, this court cannot consider nor rely upon such herein the instant facts of all, that although it is too late for this court to the plaintiff, plaintiff herein, his release from the Restricted Housing Unit and/or to prevent his transfer to the Special Management Unit such has already occurred, herein, as the Plaintiff was released from the Restricted Housing Unit at SCI-Camp Hill and taken to the Special Management Unit at the State Correctional Institution at Greene on October 24, 2000, & he has been confined therein since. This court can and should, by law, still offer this plaintiff, ordering him transferred to the Intermediate Care Unit ("ICU") at the State Correctional Institution at Waymart ("SCI-Waymart") or to State Prison mental Health Unit ("MPU") or Special Needs Unit where plaintiff can receive the necessary treatment for not only his serious mental health illness/disease, but also his criminal case sex offense, for Corrections Defendants' criminal case sex offense, for Corrections Defendants' and arguments on page 11 of their 10/23/00 Supplemental Brief Ignored and well as in their entire supplemental Brief Ignored and to the following Federal case Authorities and Law, which condemn, as

Furthermore, contrary to this Plaintiff, who has a long & lengthy history of serious mental health illness disease in the SCI-Camp Hill DC-Status/Punitve Segregation and confining him in the SCI-Camp Hill not only violates the above-cited Federal/case authorities/laws but also violates & runs afoul of the United Nations Standard Minimum Rules for the Treatment of Prisoners of which the United States is signatory to & which h state in Part B- Insane And Mentally Abnormal Prisoners, No. 82-(2),

"Prisoners who suffer from other mental diseases or abnormal states shall be observed and treated in specialized institutions under medical management!"

and it does not matter whether the inmate has a current mental health problem or not, just as long as he has had & been diagnosed from serious mental health illness disease in the prison to assist to prevent him from being confined in a PRISON R/H Unit or similar closed confinement conditions thereof such units exacerbate & magnify his serious mental health illness disease because him relapse & became a danger to himself & others as has already herein this instant case with this Plaintiff and could result/a with him again if he is left confined in the prison by any part reason also, this Plaintiff was is & will be in the future un commitment danger of serious physical injury, herein this case Sixth of all, contrary to Corrections Defendants' ad hoc & specific claims/argument if this Court were to grant this relief to Plaintiff, this Plaintiff could not simply threaten suicide in the face of any decision of the Pennsylvania Department of Corrections which he disagrees with and does not as such would do him no good as most decisions of the Pennsylvania Department of Corrections are not illegal & unconstitutional unlike the decisions & actions

ISSUE WHETHER THIS INSTANT CASE ARE, WHETHER THE CLAIMS BY BUREAU  
 CORRECTIONS DEFENDANTS, AS WELL AS THEIR CLAIMS/ARGUMENTS THAT  
 "THIS COURT WOULD BE FACED WITH AN UNENDING SERIES OF SUITS,  
 ANY PRIMATE WHO LEARNS OF A DECISION FAVORABLE TO PLAINTIFF,  
 CLAIMING THAT HE WILL COMMIT SUICIDE IF THE COURT DOES NOT  
 "DO" NOTHING MORE THAN PROTECTS & SPECIALS. MORE SPECULATIVE  
 AND CONJECTURE FROM THE OVERACTIVE MINDS OF CORRECTIONS DEFENDANTS  
AND THEIR COUNSEL, HEREIN, WHO REALLY DO NOT KNOW FOR SURE  
 THIS COURT WOULD BE FACED WITH AN UNENDING SERIES OF SUITS,  
 ANY PRIMATE WHO LEARNS OF A DECISION FAVORABLE TO PLAINTIFF,  
 DO THEY KNOW FOR SURE THAT OTHER PRIMATES WOULD LEARN OF A DECISION  
 FAVORABLE TO PLAINTIFF AND WOULD FILE SUITS CLAIMING THEY WILL  
 SUICIDE IF THE COURT DOES NOT INTERFERE, UNLESS OF COURSE, CORRECTIONS  
 DEFENDANTS AND/OR THEIR COUNSEL HAVE SOME SORT OF SPECIAL  
 MYSTICAL POWERS AND/OR A CRYSTAL BALL THAT ENABLES THEM  
 SEE INTO THE FUTURE, WHICH "IS" IMPOSSIBLE, JUST LIKE THEIR ARGUMENT  
 & FURTHERMORE IN ORDER TO CONSIDER & USE RELY UPON SUCH CLAIMS AGAINST  
 OF CORRECTIONS DEFENDANTS HERE, THIS COURT WOULD HAVE  
 ENGAGED IN SPECULATION AS TO THE LIKELIHOOD  
 OTHER PRIMATES LEARNING OF A DECISION FAVORABLE TO  
 PLAINTIFF ~~THREATENING~~ SUICIDE EVERY TIME HE DISAGREES WITH  
 DECISION OF THE PENNSYLVANIA DEPARTMENT OF CORRECTIONS AND/OR  
 THE LIKELIHOOD OF OTHER PRIMATES LEARNING OF A DECISION FAVORABLE  
 TO PLAINTIFF AND OF THE LIKELIHOOD OF SUCH OTHER PRIMATES  
 FILING AN UNENDING SERIES OF SUITS THREATENING SUICIDE  
 IF THE COURT DOES NOT INTERFERE AND SUCH SPECULATION BY  
 THIS COURT IS PROHIBITED & BANNED BY GIBBS VS CBGS, 160  
 AT 965, AND THEREFORE, CORRECTIONS DEFENDANTS' CLAIMS & ARGUMENTS  
ARE CONTRARY TO THE CONSTITUTIONAL FEDERAL CASE AUTHORITY/ LAW WHICH  
 MAY NOT BY LAW EVER CONSIDER USE RELY UPON SUCH, HEREIN THIS THAT ADVICE

Even if such were true & this Court could consider it, why then should that, that would "not" be a bad thing, as it would be one way of putting in the overcrowding population of the inmates and would get rid of more of the Rogers & the Spics in the Pennsylvania State Prison. (seventh of all, there is a very simple solution to prevent other inmates finding out about any decision of this court, favorable to this Plaintiff, which is, do not publish it, since almost all (if not all) inmates do not have access to get unpublished decisions of this court.)

#### D. PLAINTIFF'S FURTHER/OTHER ARGUMENTS

SIX OTHER THINGS WHICH THE PLAINTIFF WISHES TO STATE FOR

HEREIN.

First of all, Plaintiff avers & submits, that Plaintiff really stagnated back in March, 1999, he ~~was~~ <sup>was</sup> considered to have a mental health disease due to being maltreated by Defendants Dr. Clark and by Defendants Pabakovich & Kazar & over four years of Disciplinary Custody Status, more which he had received for the exact same type of misconduct charge that he is now doing. Do-Statute time for, it is missed as Defendant Clark & Defendants Pabakovich & Kazar considered such time, negligence to have occurred as a result of Plaintiff's serious mental health disease & then all of a sudden once Plaintiff starts talking about instituting this here court action, Plaintiff is no longer considered to be a mental health case, hmm, sounds retaliatory to me see of all in GIBBS, 160 F.3d 1962 (ed. 1998) (11th Circuit Court of Appeals, ~~state that~~), inmates ought to be able to complain about unsafe, life-threatening conditions in their prison, without waiting for something to happen to them. (GIBBS, 160 F.3d at 965).



Thus, we will not read the language of § 1915(g) to require that the "imminent danger" allegation be a common part fed by allegations of an existing serious physical injury. In order to bring a prisoner within the statutory exception to the three strikes provision, it is sufficient that the condition poses an imminent danger of serious physical injury. (GIBBS, 160 F.3d at 967).

and Corrections Defendants' claims arguments here are contrary to the above this is the case herein the instant case, where if there was ever a case crying out for the definition of imminent danger of serious physical injury, it is plaintiff for there is no greater danger than the risk of a danger of an inmate attempting to attack another inmate & another inmate has not been

Third DRAFT THIS COURT GRANTS CORRECTIONS DEFENDANT'S MOTION TO REVOKE PLAINTIFF'S IN FORMA PAUPERIS STATUS, THEREIN THIS COURT WILL EFFECTIVELY CLOSE THE DOOR TO THIS FEDERAL COURT ON PLAINTIFF'S CLAIMS & DENY HIM THE RELIEF WHICH HE REQUESTS, HEREIN, & THE PLAINTIFF GETS SICK & ANOTHER MENTAL HEALTH RELAPSE & HAVING HIMSELF OR GOD FORBID, SUICIDES KILLING HIMSELF, WHICH IS WILL BE A POSSIBLE, IF NOT PROBABLE, RISK OCCURRING, SO LONG AS THE PLAINTIFF DOES NOT GET THE HELP & TREATMENT THE SERIOUS MENTAL HEALTH PROBLEMS & DISEASE WHICH HE SO DESPERATELY NEEDS THAN THIS COURT WILL NOT HAVE DONE ITS DUTY UNDER THE LAW & THAT PLAINTIFF WILL POSSIBLY EVEN HIS DEATH WILL REST SOLELY UPON THE SHOULDERS OF THE JUDGES THIS COURT, BUT THEN IT WILL BE TOO LATE FOR THIS PLAINTIFF, AS HE WILL BE DEAD. AS HIS LAST CHANCE FOR HOPE, THE PLAINTIFF'S CRYING OUT DESPERATION FOR THIS COURT'S HELP, WILL THIS COURT BE SO CALLUS & TURN TO PLAINTIFF'S LIFE AS TO TURN A DEAF EAR TO HIS CRIES & PLEAS FOR HELP. THIS COURT IS PLAINTIFF'S LAST CHANCE & HOPE TO GET TREATMENT & PRISONERS ARE HUMAN BEINGS ALSO & THIS COURT HAS A SURNIDITY & OBLIGATION TO PROTECT & DEFEND A PRISONER'S RIGHTS & LIFE AS ZEALOUS AS IT WOULD PROTECT & DEFEND A NON-PRISONER'S RIGHTS & LIFE & THIS COURT WILL HAVE INFLICTED SUCH A OATH & DUTY, HEREIN THIS CASE, PLAINTIFF GRANTS CORRECTIONS DEFENDANT'S MOTION TO REVOKE PLAINTIFF'S IN FORMA PAUPERIS STATUS, HEREIN IN THIS CASE.

PLAINTIFF REMINDS THIS COURT OF WHAT U.S. DISTRICT JUDGE KANG, ST. HELD IN BARRE v. GOVERNMENT OF VIRGIN ISLANDS, 415 F. SUPP. 1218, VI-1978, WHICH IS STILL BE TODAY ALMOST 25 YEARS LATER:

"When we consent to the disengagement of the constitutional rights of any citizen, no matter how unacceptable that person may be in the eyes of society, whether affirmatively or through high implication by inaction, then it becomes easier and easier to compromise those rights in the future when it comes to other classes of persons whom we may not care for. The strength of a constitutional guarantee can be measured by the protection which they afford to an unpopular member. By denying them to some, they have less meaning for us all." (Barre, 415 F. Supp. at 1231)

Furthermore, fourth of all, PLAINTIFF CANNOT & WILL NOT PROMISE THIS COURT HE WILL NOT COMMIT SUICIDE OR ACTUALLY COMMIT SUICIDE IF THIS COURT GRANTS CORRECTIONS DEFENDANT'S MOTION TO REVOKE PLAINTIFF'S IN FORMA PAUPERIS STATUS, HEREIN & DRAFTS THIS DRAFT, BECAUSE HE WILL NOT KNOW WHAT HE WILL OR WILL NOT DO (IN ALL REALITY, WHETHER HE DOES THE CARE OF HIS DEFENDANTS, FORSURE) BUT IF HE GETS SICK & HAS ANOTHER MENTAL HEALTH RELAPSE, THAN THE CHANCES ARE HIGH HE WILL DO THIS THE STATES GIVE WAY TOO HIGH TO TAKE A CHANCE AGAINST THEM, WHEN THIS IS THE PLAIN & PHYSICAL SAFETY, WE ARE THINKING ABOUT HIS PLAIN & SIMPLE, NOT HAVE TO ENGAGE IN SPECULATION AS TO THE POSSIBILITY OF WHETHER THE PLAINTIFF WILL DO IT.

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mental health professionals who made them & often the material facts between the parties, herein this case, exercise its discretion & authority & appoint & retain the health experts independently examine the plaintiff, herein file an impartial & independent report & recommendation w/ this Court, pursuant to Fed. R. Evid. 703 & then go w/ whatever expert says. 20) Lastly, plaintiff finds this Court that given which the States argues & sets forth herein above & SUBSTANTIALLY untrue, specious, baseless, factually & legally Plaintiff's claims & arguments as them relevant & incredible evidence/~~in~~ <sup>with</sup> a healthy dose of skepticism & a grain of such claims & arguments of correctness herein are nothing more than a blatant attempt on their part to create a smokescreen with which they hope to obfuscate the real issues herein & illegal & unconstitutional actions conducted therein, & they, this Plaintiff, will not stop at nothing to get this Court to rule in their favor, herein this case.

## CONCLUSION

(W) HEREBY, given & based upon the foregoing facts, argumentations of Author, the herein SUPER, upon stated in the Plaintiff's accompanying affidavit in support of Plaintiff's opposition to Corrections Defendants' motion to Revoke Plaintiff's In Fama Paupers status and to defer filing of responsive pleading to Plaintiff's Amended Complaint upon the Plaintiff's In Trial & Amended Complaints upon that stated that such as such the Corrections Defendants failed to show that this Plaintiff is not under imminent danger of serious physical injury at the time of the incident(s) alleged in the Plaintiff's In Trial Complaint herein this case; however, on the other hand, this Plaintiff will show that he was not in imminent danger of serious physical injury at the date/time of the incident(s) alleged in his In Trial Complaint, herein this case, therefore Corrections Defendants' motion to Revoke Plaintiff's In Fama Paupers status and to defer filing of responsive pleading to Plaintiff's Amended Complaint, must by law be denied with pre-judice, by the court, Plaintiff Defendants should be ordered to file a responsive pleading to the Plaintiff's Amended Complaint, herein this case, within twenty (20) days of receipt of this court's order. Judgment by default will be entered against them upon the trial date.

Dated: 30th DECEMBER 2000 (S)

MR. JOHN RICHARD JAMES  
Sgt. Greene and

VERIFICATION

I, Plaintiff and Rose Caneel John Richard JRC  
Verify under the penalty of perjury that the foregoing is  
correct to the best of my knowledge & belief, per  
to 28 U.S.C. § 1746.

(S) John Richard JRC  
MR. JOHN RICHARD JRC  
#BQ-3219  
SGT-Greene/SMU  
175 PROGRESS Drive  
Waynesburg, PA 15370  
Plaintiff and Rose Caneel

Dated/Executed on =  
30th DECEMBER 2002  
At Waynesburg, Pennsylvania =